

Pinnacles Telephone Co.
2017 Annual Statement of FCC CPNI Rule Compliance

This statement accompanies the 2017 Customer Proprietary Network Information (“CPNI”) Certification for the above listed company as required by Section 64.2009(e) of the Federal Communications Commission’s (“FCC’s”) rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC’s rules. See C.F.R. § 64.201 et. seq.

Identification of CPNI

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222 (f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

Identification of Services Affected by CPNI Rules

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunication services that affect how the Company uses CPNI.

Identification of Permissible Use of CPNI without Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI which do **not** require customer authorization under Section 64.2005.

Identification of Use of CPNI Requiring Customer Authorization

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

Customer Notification and Authorization Process

The Company has established procedures and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under Section 64.2008; however, Pinnacles Telephone Co. does not provide CPNI to any affiliate and does not engage in any outbound marketing of available services to subscribers – with or without CPNI.

Record of Customer CPNI Approval/Non-Approval

The Company has sufficient systems in place for maintaining a readily accessible record of whether and how a customer responds to approval to use CPNI for marketing purposes as required by Section 64.2009(a); however, Pinnacles Telephone Co. does not provide CPNI to any affiliate and does not engage in any outbound marketing of available services to subscribers – with or without CPNI.

Procedures Protecting Against Disclosure of CPNI

The Company implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company has implemented password back-up authentication procedures in compliance with Section 64.2010(e).

The Company has implemented procedures to notify customers of account changes.

Actions Taken Against Data Brokers and Responses to Customer Complaints

Pursuant to Section 64.2009, the Company has not taken any action against data brokers and has not received any customer complaint in the past year concerning the unauthorized release of CPNI.

Disciplinary Process

The Company has in place a disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2006(b).

Supervisory Review Process for Outbound Marketing

The Company currently does not (and will not) utilize outbound marketing. Before undertaking the use of CPNI for outbound marketing purposes, the Company will establish a supervisory review process to ensure compliance with Section 64.2009(d).

Procedures for Notifying Law Enforcement of CPNI Security Breaches

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with the related recordkeeping and deferred notification of customers.